

WILLIAM A. ISAACSON (Admitted *Pro Hac Vice*)
(wisaacson@bsfllp.com)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave, NW, Washington, DC 20015
Telephone: (202) 237-2727; Fax: (202) 237-6131

JOHN F. COVE, JR. #212213
(jcove@bsfllp.com)
BOIES, SCHILLER & FLEXNER LLP
1999 Harrison Street, Suite 900, Oakland, CA 94612
Telephone: (510) 874-1000; Fax: (510) 874-1460

RICHARD J. POCKER #114441
(rpocker@bsfllp.com)
BOIES, SCHILLER & FLEXNER LLP
300 South Fourth Street, Suite 800, Las Vegas, NV 89101
Telephone: (702) 382 7300; Fax: (702) 382 2755

DONALD J. CAMPBELL (Admitted *Pro Hac Vice*)
(djcc@campbellandwilliams.com)
J. COLBY WILLIAMS (Admitted *Pro Hac Vice*)
(jcw@campbellandwilliams.com)
CAMPBELL & WILLIAMS
700 South 7th Street, Las Vegas, Nevada 89101
Telephone: (702) 382-5222; Fax: (702) 382-0540

*Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

Cung Le, Nathan Quarry, Jon Fitch, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No. 5:14-cv-05484 EJD

**DEFENDANT ZUFFA LLC'S
STATEMENT OF NON-OPPOSITION TO
MOTION TO APPOINT INTERIM CO-
LEAD CLASS COUNSEL**

Date: June 11, 2015
Time: 9:00 a.m.
Place: Courtroom 4
Judge: Hon. Edward J. Davila

Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 5:14-cv-05591 EJD

Brandon Vera and Pablo Garza, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 5:14-cv-05621 EJD

Gabe Ruediger and Mac Danzig, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 5:15-cv-00521 EJD

Pursuant to Civil Local Rule 7-3(b), Defendant Zuffa, LLC (“Zuffa”) hereby submits this statement of non-opposition to Plaintiffs’ motion to appoint interim co-lead class counsel. (*Le* Dkt. 58; *Vazquez* Dkt. 34; *Vera* Dkt. 34).¹ Zuffa takes no position regarding the appropriateness of Berger & Montague, P.C., Cohen Milstein Sellers & Toll PLLC, and the Joseph Saveri Law Firm, Inc. to serve as interim co-lead class counsel. In taking no position on the appointment of interim counsel, Zuffa does not concede that these actions are properly brought as class actions nor does Zuffa waive the right to challenge the ability of class counsel to fairly and adequately represent the class. Also, this statement of non-opposition does not indicate Zuffa’s acceptance of or agreement with any of the facts alleged or legal contentions raised in Plaintiffs’ motion to appoint interim co-lead counsel and accompanying papers, and Zuffa reserves all rights to contest such allegations and contentions.

Dated: February 27, 2015

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ John F. Cove, Jr.

John F. Cove, Jr.

Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC

¹ Plaintiffs’ Notice of Motion states that the motion is brought on behalf of all Plaintiffs, including Plaintiffs Ruediger and Danzig, but it was not filed in the *Ruediger* case. Zuffa does not oppose the motion to the extent it is deemed filed in the *Ruediger* case as well.